



A Subsidiary of
Dow Chemical Company

169867

K. 4

7/14/94

PGH-94-MJD-638

July 14, 1994

Ms. Karen Vendl
U.S. Environmental Protection Agency
Region V
77 West Jackson Boulevard
HSRL-6J
Chicago, Illinois 60604

Subject: Enviro-Chem Superfund Site
Monthly Progress Report No. 11
June 11, 1994 through July 8, 1994

Dear Karen:

Enclosed is the subject progress report. A copy of the report has been submitted to Jim Smith at IDEM.

Sincerely,

Mark J. Dowiak, P.E.
Project Manager

MJD/rks

Attachment

cc: R. Ball - ERM-North Central
N. Bernstein - Bernstein & Associates
J. Kyle - Barnes & Thornburg



A Subsidiary of
the Dow Chemical Company

TO: James R. Smith, Ph.D., IDEM
Karen Vendl, U.S. EPA Region V

DATE: July 13, 1994

FROM: Mark J. Dowiak, P.E., Project Manager *M. Dowiak*

COPIES: Roy O. Ball, Ph.D. - ERM-North Central
Norman Bernstein, Esq. - Bernstein & Associates
John Kyle, Esq., Barnes & Thornburg

SUBJECT: Enviro-Chem Superfund Site
Monthly Progress Report Number 11
June 11, 1994 through July 8, 1994

This Monthly Progress Report has been prepared in accordance with Section XII of the Consent Decree entered September 10, 1991, Number 83-1419 C, U.S.D.C. District of Indiana.

Activities

On June 14, 1994, AWD Technologies, Inc. (AWD) submitted a draft Drum Inventory Work Plan to U.S. EPA and IDEM. The drum inventory will be the initial step in the drum removal activity. The drum removal specification will be prepared after completion of the inventory.

On June 14, 1994, Quality Environmental Management Inc. (QEM) conducted the June site inspection. The Parcel 45 diversion channels remain open and are functional. Minor erosion has occurred as evidenced by two exposed fencepost concrete footers and sediment accumulation in the culvert at the northwest corner of the site. Channel erosion was noted to be no worse than the May 1994 site inspection.

On June 17, 1994 a presentation of the Revised Response Action (RRA) was made to U.S. EPA, IDEM and CH2M Hill by the Enviro-Chem Trustees with AWD. The presentation outlined the proposed RRA concept. It included excavation of Area C including the concrete pad, aggregate and subgrade soils, transfer of the soils to Areas A and B, soil vapor extraction of Areas A and B including the soil/crushed concrete/aggregate fill areas, cap design and timing of the cap construction, air monitoring, and verification of the site cleanup in accordance with the Consent Decree. Upcoming design submittals and a 1994 project schedule were also outlined. U.S. EPA was in general agreement with the RRA approach. Substantial discussion focused on the purpose and timing of sampling in the concrete pad area. The parties agreed to discuss the issue further, including further consideration of some type of "removal action" field screening and/or soil sampling. The sampling approach will be included in the RRA Preliminary Design submittal.

In a June 23, 1994 letter to U.S. EPA, Mark Dowiak outlined an alternative approach for implementation of the Support Zone Investigation. This included focusing the investigation on

the two areas found during the SPMR activities to have detectable levels of volatile organics, sampling for soil gas by insitu soil probing and taking soil samples based on those results, and expanding the sampling area based on the results of the soil gas analyses.

In a June 27, 1994 letter to Mark Dowiak, U.S. EPA responded to the June 23, 1994 letter concerning the alternative approach to the SZI. In a June 27, 1994 letter to Trustees Roy Ball and John Kyle, U.S. EPA also requested confirmation concerning the revised list of acceptable concentrations for nine new organic compounds to be added to Table 3-1 of the Consent Decree. See the July 8 response letter to U.S. EPA.

In a July 8, 1994 letter to U.S. EPA, the Trustees responded to U.S. EPA's two letters of June 27, 1994. With respect to the SZI issue, the Trustees position was presented on the history of the western remedial boundary and indicated that the Trustees' proposed sampling program would be contained in a revised SZI Field Sampling Plan to be delivered to U.S. EPA the week of July 11, 1994.

With respect to the revised list of acceptable concentrations for nine new compounds, the Trustees indicated that this issue will be addressed and the Trustees approach will be described in a letter submitted to U.S. EPA during the week of July 18, 1994.

Activities to be Conducted from July 9 through August 12, 1994.

A site inspection will be conducted by QEM on July 12, 1994.

The Trustees will send U.S. EPA a letter regarding the nine compounds during the week of July 18, 1994.

The Draft Preliminary Design (30 percent) for the RRA will be submitted to U.S. EPA and IDEM on July 29, 1994.

An Evaluation of Alternatives memorandum for the RRA will be submitted to U.S. EPA and IDEM on July 29, 1994.

The Trustees hope to receive U.S. EPA approval of the Drum Inventory Work Plan so that work can be scheduled.

MJD/rks